

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

EDMONDSON COMMUNITY  
ORGANIZATION, INC., *et al.*,

Plaintiffs,

v.

MAYOR AND CITY COUNCIL OF  
BALTIMORE, *et al.*,

Defendants.

Case No.: 1:24-cv-01921-BAH

**DEFENDANT EAST COAST TAX AUCTION, LLC'S  
ANSWER TO AMENDED COMPLAINT**

East Coast Tax Auction, LLC ("ECTA"), by and through its undersigned counsel, hereby files this Answer the Amended Complaint (the "**Complaint**") filed by Plaintiffs, Edmondson Community Organization, Inc. ("ECO") and Bonita Anderson ("Ms. Anderson") (collectively, "**Plaintiffs**"), as follows:

1. ECTA lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 1 of the Complaint.

2. ECTA lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 2 of the Complaint.

3. ECTA denies that it "took" the property at 2801 Roslyn Avenue in Baltimore City. ECTA lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 3 of the Complaint. To the extent a response is required, ECTA denies the remaining allegations in Paragraph 3 of the Complaint.

4. ECTA admits the allegations in Paragraph 4 of the Complaint.
5. ECTA admits the allegations in the first sentence in Paragraph 5 of the Complaint.

ECTA lacks knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 5 of the Complaint. To the extent a response is required, ECTA denies the remaining allegations in Paragraph 5 of the Complaint.

6. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 6 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 6 of the Complaint.

7. ECTA admits that it is a limited liability company with its principal place of business in Connecticut. ECTA denies that it “took” Ms. Anderson’s property. ECTA denies the remaining allegations in Paragraph 7 of the Complaint.

8. Paragraph 8 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 8 of the Complaint.

9. Paragraph 9 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 9 of the Complaint.

10. ECTA admits that tax sales are controlled, in part, by the referenced statutes.

11. Paragraph 11 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 11 of the Complaint.

12. Paragraph 12 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 12 of the Complaint.

13. Paragraph 13 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 13 of the Complaint.

14. Paragraph 14 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 14 of the Complaint.

15. Paragraph 15 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 15 of the Complaint.

16. Paragraph 16 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 16 of the Complaint.

17. Paragraph 17 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 17 of the Complaint.

18. Paragraph 18 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 18 of the Complaint.

19. Paragraph 19 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 19 of the Complaint.

20. Paragraph 20 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 20 of the Complaint.

21. Paragraph 21 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 21 of the Complaint.

22. ECTA denies the allegations in Paragraph 22 of the Complaint.

23. Paragraph 23 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 23 of the Complaint.

24. Paragraph 24 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 24 of the Complaint.

25. Paragraph 25 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 25 of the Complaint.

26. ECTA denies the allegations in Paragraph 26 of the Complaint.

27. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 27 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 27 of the Complaint.

28. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 28 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 28 of the Complaint.

29. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 29 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 29 of the Complaint.

30. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 30 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 30 of the Complaint.

31. ECTA denies the allegations in Paragraph 31 of the Complaint.

32. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 32 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 32 of the Complaint.

33. ECTA denies the allegations in Paragraph 33 of the Complaint.

34. ECTA denies the allegations in Paragraph 34 of the Complaint.

35. ECTA denies the allegations in Paragraph 35 of the Complaint.

36. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 36 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 36 of the Complaint.

37. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 37 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 37 of the Complaint.

38. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 38 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 38 of the Complaint.

39. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 39 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 39 of the Complaint.

40. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 40 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 40 of the Complaint.

41. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 41 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 41 of the Complaint.

42. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 42 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 42 of the Complaint.

43. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 43 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 43 of the Complaint.

44. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 44 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 44 of the Complaint.

45. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 45 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 45 of the Complaint.

46. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 46 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 46 of the Complaint.

47. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 47 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 47 of the Complaint.

48. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 48 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 48 of the Complaint.

49. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 49 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 49 of the Complaint.

50. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 50 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 50 of the Complaint.

51. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 51 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 51 of the Complaint.

52. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 52 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 52 of the Complaint.

53. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 53 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 53 of the Complaint.

54. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 54 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 54 of the Complaint.

55. ECTA denies the allegations in Paragraph 55 of the Complaint.

56. ECTA denies the allegations in Paragraph 56 of the Complaint.

57. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 57 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 57 of the Complaint.

58. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 58 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 58 of the Complaint.

59. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 59 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 59 of the Complaint.

60. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 60 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 60 of the Complaint.

61. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 61 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 61 of the Complaint.

62. ECTA denies the allegations in Paragraph 62 of the Complaint.

63. ECTA lacks knowledge or information sufficient to form a belief as to the allegations in Paragraph 63 of the Complaint. To the extent a response is required, ECTA denies the allegations in Paragraph 63 of the Complaint.

64. ECTA admits the allegations in Paragraph 64 of the Compliant.

65. ECTA denies the allegations in Paragraph 65 of the Complaint.

66. Paragraph 66 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 66 of the Complaint.

67. Paragraph 67 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 66 of the Complaint.

68. Paragraph 68 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 68 of the Complaint.

69. Paragraph 69 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 69 of the Complaint.

70. Paragraph 70 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 70 of the Complaint.

71. Paragraph 71 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 71 of the Complaint.

72. Paragraph 72 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 72 of the Complaint.

73. Paragraph 73 relates to parties other than ECTA; therefore, no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 73 of the Complaint.

## **COUNT I**

74. In answer to Paragraph 74, ECTA repeats and realleges the foregoing answers to the Complaint as if fully and completely restated herein.

75. ECTA denies the allegations in Paragraph 75 of the Complaint.

76. ECTA denies the allegations in Paragraph 76 of the Complaint.

77. ECTA denies the allegations in Paragraph 77 of the Complaint.

78. ECTA denies the allegations in Paragraph 78 of the Complaint.

79. ECTA denies the allegations in Paragraph 79 of the Complaint.

80. ECTA denies the allegations in Paragraph 80 of the Complaint.

81. ECTA denies the allegations in Paragraph 81 of the Complaint.

82. ECTA denies the allegations in Paragraph 82 of the Complaint.

83. Paragraph 83 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 83 of the Complaint.

84. Paragraph 84 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 84 of the Complaint.

85. Paragraph 85 of the Complaint asserts legal conclusions for which no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 85 of the Complaint.

86. ECTA denies the allegations in Paragraph 86 of the Complaint.

87. ECTA denies the allegations in Paragraph 87 of the Complaint.

## **COUNT II**

88. In answer to Paragraph 88, ECTA repeats and realleges the foregoing answers to the Complaint as if fully and completely restated herein.

89. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 89 of the Complaint.

90. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 90 of the Complaint.

91. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 91 of the Complaint.

92. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 92 of the Complaint.

93. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 93 of the Complaint.

94. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 94 of the Complaint.

95. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 95 of the Complaint.

96. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 96 of the Complaint.

97. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 97 of the Complaint.

98. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 98 of the Complaint.

99. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 99 of the Complaint.

100. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 100 of the Complaint.

101. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 101 of the Complaint.

### **COUNT III**

102. In answer to Paragraph 102, ECTA repeats and realleges the foregoing answers to the Complaint as if fully and completely restated herein.

103. Paragraph 103 relates to parties other than ECTA; therefore, no response is required. To the extent that a response is required, ECTA denies the allegations in Paragraph 103 of the Complaint.

104. Paragraph 104 relates to parties other than ECTA; therefore, no response is required. To the extent that a response is required, ECTA denies the allegations in Paragraph 104 of the Complaint.

105. Paragraph 105 relates to parties other than ECTA; therefore, no response is required. To the extent that a response is required, ECTA denies the allegations in Paragraph 105 of the Complaint.

106. Paragraph 106 relates to parties other than ECTA; therefore, no response is required. To the extent that a response is required, ECTA denies the allegations in Paragraph 106 of the Complaint.

### **COUNT III**

107. In answer to Paragraph 107, ECTA repeats and realleges the foregoing answers to the Complaint as if fully and completely restated herein.

108. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 108 of the Complaint.

109. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 109 of the Complaint.

110. This claim was dismissed, and no response is required. To the extent a response is required, ECTA denies the allegations in Paragraph 110 of the Complaint.

### **DEFENSES**

1. Plaintiffs have failed to state a claim on which relief could be granted.

2. Plaintiffs' claims are barred by res judicata and the Rooker Feldman Doctrine. Plaintiffs' requested relief could and should have been raised in the state court action because the alleged unconstitutional taking was already defined as of the filing of that action.

3. ECTA is not a state actor, as set forth in ECTA's motion to dismiss.

4. ECTA purchased the property in the tax sale, not the tax lien, as set forth in ECTA's motion to dismiss.

5. Any losses suffered by Plaintiffs are attributable in whole or in part due to their own acts, omissions, and/or conduct.

6. Plaintiffs' claims are barred by the statute of limitations and laches.

7. ECTA incorporates by reference the defenses and arguments raised in the motions to dismiss and answers filed by each of the Defendants.

8. ECTA reserves the right to assert additional defenses should discovery provide more information to give rise to same.

Date: September 22, 2025

Respectfully submitted,

*/s/ Elchanan "Elliott" Engel*  
Elchanan ("Elliott") Engel, Bar No. 28299  
**BERMAN, BOYLE & ENGEL LLC**  
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*Attorney for East Coast Tax Auction, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22nd day of September 2025, a copy of the foregoing was electronically served and is available for download via the ECF system.

/s/ *Elchanan “Elliott” Engel*  
Elchanan “Elliott” Engel